

Campaign for National Parks

Canopi, 82 Tanner Street, London SE1 3GN

020 3096 7714

info@cnp.org.uk

www.cnp.org.uk

By email to: ReopenerConsultations@ofgem.gov.uk

**Response to Ofgem Consultation on RIIO-2 Visual Impact Mitigation Re-opener:
National Grid Electricity Transmission's Cotswolds project**

April 2026

1. Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire action for wilder, inclusive National Parks. We have been campaigning for nearly 90 years and our independence from Government means we can speak for National Parks when no-one else can.
2. We have a long-standing interest in National Grid's VIP programme having been closely involved, alongside other environmental NGOs, in the development and implementation of the visual amenity allowances for both electricity and distribution operators. We strongly oppose Ofgem's decision to reject National Grid's request for the funding needed to complete the Cotswold VIP project on the grounds that:
 - This position is incompatible with Ofgem's statutory responsibilities towards Protected Landscapes.
 - There is strong public support for the Cotswold VIP project.
 - Failing to complete the project would waste the funding, stakeholder time and other resources that have already been spent on preparatory work.

We provide further detail on these and our other reasons for disagreeing with Ofgem's decision below.

Failure to comply with statutory responsibilities

3. Both Ofgem and National Grid must give serious consideration to the need to reduce the negative impacts of transmission infrastructure in Protected Landscapes in line with their environmental responsibilities under various legislation including the Electricity Act 1989 and the Environment Act 2021 and their statutory duties relating to the purposes of Protected Landscapes.
4. The Protected Landscape duties were one of the primary driving forces behind the initial establishment of the VIP programme and these duties have recently been strengthened making it even more imperative that the bodies to which they apply (which includes both Ofgem and statutory undertakers such as National Grid) take appropriate action to support the purposes of Protected Landscapes. Changes set out in Section 245 of the Levelling Up and Regeneration Act (LURA) 2023 mean that the previous duty "to have regard to" the statutory purposes of National Parks is now a duty "to seek to further" these purposes. Defra guidance on the new duty¹ makes it very

¹ [The Protected Landscapes duty - GOV.UK](#)

Campaign for National Parks

Canopi, 82 Tanner Street, London SE1 3GN

020 3096 7714

info@cnp.org.uk

www.cnp.org.uk

clear that the bodies to which it applies must now take a much more proactive and thorough approach to demonstrating how they are seeking to further the statutory purposes. Natural England has also published advice which makes it clear that the new duty is significantly stronger than the previous duty². Approving this funding would demonstrate that Ofgem is taking its responsibilities under LURA s245 seriously.

5. There is a reference in the consultation document to the fact that the area's designation as a National Landscape means that "it is important that special efforts are made to conserve and enhance the natural beauty of the area" (para 2.3). However, it is not just important to do this, it is a statutory requirement and it is concerning that there is no reference to the LURA s245 duty, let alone any indication of how Ofgem took account of this duty in coming to this decision.
6. Furthermore, paragraph 2.9.21 of EN5, the Electricity Networks National Policy Statement³ sets out a general presumption in favour of the use of undergrounding rather than overhead lines in Protected Landscapes. The long-term goal for visual amenity should be that, where practically feasible, all existing distribution and transmission lines run underground through designated landscapes and their settings, and that new lines run underground through these areas or avoid them altogether, in line with paragraph 2.9.21 of EN5.

Consumer support

7. There is a very strong case for this funding and a high level of support for removing electricity infrastructure from Protected Landscapes as demonstrated by a number of different studies relating to both transmission and distribution operations. This includes willingness to pay research carried out at Ofgem's request by National Grid in 2024, which demonstrated broad public support for the project among a representative sample of 2000 billpayers across England, Scotland and Wales. This research demonstrated strong public support for the Cotswolds VIP project with 82% of respondents supporting the project, including the projected bill impact of 13p per annum for 25 years.

Making best use of resources

8. The Cotswold VIP project has been developed in accordance with National Grid's revised VIP policy which Ofgem confirmed support for in November 2023 and has been designed to deliver strongly against the principles in this policy. This particular

² For details of Natural England's advice, see for example, this response to the Development Consent Order for the A66 Trans-Pennine Project: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010062/TR010062-002418-Natural%20England.pdf>

³ [National Policy Statement for electricity networks infrastructure \(EN-5\), 2025 - GOV.UK](#)

Campaign for National Parks

Canopi, 82 Tanner Street, London SE1 3GN

020 3096 7714

info@cnp.org.uk

www.cnp.org.uk

section of overhead line was selected for inclusion in the VIP programme as it had been identified by an independent landscape and visual impact study as having some of the greatest landscape and visual impacts within a Protected Landscape.

9. Development of the project began in 2021 and, building on valuable lessons from the national programme, has involved a collaborative approach including extensive and sustained engagement with local communities, statutory bodies, and a wide range of other organisations including those represented on the VIP Stakeholder Advisory Group (SAG). This high level of engagement has ensured that the project reflects community and environmental priorities. There is also strong support for this project among national stakeholders as demonstrated by the time commitment that we, and other organisations, are making to support this work through our involvement in the VIP SAG. The VIP programme has been increasingly influential since it was established 12 years ago, due at least in part to the high level of commitment shown by a range of nature, landscape and heritage NGOs and statutory bodies, as well as senior executives from National Grid and Ofgem.
10. It is essential that full value for money is achieved from all the resources that have already gone in to developing the project. Agreeing this funding will maximize the benefits from the preparatory work that has already been undertaken, while cancellation of the project will seriously undermine the collaborative ways of working that Ofgem, National Grid and the SAG have been developing since the inception of the VIP programme. This will be reputationally damaging at a time when this collaborative approach needs strong endorsement as it will be essential for the successful delivery of the Great Grid Upgrade.

Other reasons for approving the funding

11. National Grid's request for this funding was made in May 2025 well within the time frame for RIIO-T2 which ran from April 2021-March 2026 and which included a £465 million provision for visual amenity projects, the bulk of which has not been spent. National Grid had ensured that the need case for the Cotswolds VIP project was as strong (if not stronger) than the North Wessex VIP project which was approved in 2023 at a time of economic crisis caused by Russia's invasion of Ukraine.
12. Finally, consideration must be given to the economic impacts of refusing this funding. There are over 23 million visitors to the Cotswold National Landscape each year generating more than £1 billion for the local economy and supporting thousands of jobs. Many of these visitors are specifically attracted to the area by the natural beauty of the landscape. The section of line to be undergrounded is visible from a number of highly popular walking routes including the Cotswold Way National Trail which according to Natural England is the most walked long distance trail in England and



Campaign for National Parks

Canopi, 82 Tanner Street, London SE1 3GN

020 3096 7714

info@cnp.org.uk

www.cnp.org.uk

attracts visitors from around the world. Significant stretches of the trail especially on the High Cotswold Plateau will have views enhanced by the removal of the overhead line. Approving this funding would thus increase the area's appeal for quiet recreation and provide strong support to the local economy.

We are happy for this response to be made publicly available. Please contact Ruth Bradshaw (email: ruthb@cnp.org.uk) if you would like further information about any of the points raised.